State: District of Columbia Filing Company: Bankers Fidelity Life Insurance Company

TOI/Sub-TOI: L07G Group Life - Whole/L07G.101 Fixed/Indeterminate Premium - Single Life

Product Name: Group Level Whole Life - Amendment

Project Name/Number: /

Filing at a Glance

Company: Bankers Fidelity Life Insurance Company
Product Name: Group Level Whole Life - Amendment

State: District of Columbia

TOI: L07G Group Life - Whole

Sub-TOI: L07G.101 Fixed/Indeterminate Premium - Single Life

Filing Type: Form

Date Submitted: 01/09/2020

SERFF Tr Num: BFLI-132216365
SERFF Status: Submitted to State

State Tr Num:

State Status:

Co Tr Num: DC B 21803 A1

Implementation On Approval

Date Requested:

Author(s): Jill Jones, Bridgett Williams, Tina Cunningham, Lyn Ezell, Pamela Kelly, Emily Alvis, Ada

Ngoka, Mary Witt

Reviewer(s):

Disposition Date:
Disposition Status:
Implementation Date:

State: District of Columbia Filing Company: Bankers Fidelity Life Insurance Company

TOI/Sub-TOI: L07G Group Life - Whole/L07G.101 Fixed/Indeterminate Premium - Single Life

Product Name: Group Level Whole Life - Amendment

Project Name/Number: /

General Information

Project Name: Status of Filing in Domicile: Pending

Project Number: Date Approved in Domicile:

Requested Filing Mode: Review & Approval Domicile Status Comments: GA is domicile state

Explanation for Combination/Other: Market Type: Group

Submission Type: New Submission Group Market Size: Small and Large

Group Market Type: Employer Overall Rate Impact:

Filing Status Changed: 01/09/2020

State Status Changed: Deemer Date:

Created By: Mary Witt Submitted By: Mary Witt

Corresponding Filing Tracking Number:

Filing Description:

The attached Amendment forms are being submitted to your department for formal review and approval; these are new forms and do not replace any existing form on file with your department. These Amendments will be used with our Group Whole Life product, Certificate Form No. B 21803 CRT-E, approved by your department on 08/02/2018 under SERFF Filing #' BFLI-131594022.

- 1. Amendment form B 21803 A1 amends the certificate to allow direct issue to the covered spouse; therefore, the definition of "Insured" is being amended to remove specific reference to the Employee or Member as the sole insured. Other revisions to the Conditions of Coverage provision are necessary to apply specifically to a spouse-issued certificate.
- 2. Amendment Form B 21803 A2 amends the certificate to postpone the effective date for a covered dependent (other than a newborn child) who is either hospital or home confined, or receiving assistance due to the inability to perform 2 activities of daily living at the time of initial enrollment. Any child covered as a result of replacement issued insurance will be covered immediately under the certificate with respect to the amount of coverage that was in force under the prior plan.

These forms are computer-generated, laser-printed and presented in final print format with variable data identified. A Statement of Variability is included.

In addition, we have enclosed an Actuarial Memorandum Addendum for approval by your department. This memorandum is being filed in to utilize the 2017 CSO Composite Tobacco Cash Values on the Group Whole Life product referenced above. No other details of the previously approved filing are being changed and this Addendum does not change anything in the actuarial memorandum that was approved; it only adds composite tobacco values to the product.

Thank you for your time in review of this filing. If you have any questions, or need additional information, please contact me at 404-266-5626 or email mwitt@bflic.com.

Company and Contact

Filing Contact Information

Mary Witt, Compliance Analyst L1 4370 Peachtree Road NE Atlanta, GA 30319

mwitt@bflic.com 404-266-5626 [Phone]

State: District of Columbia Filing Company: Bankers Fidelity Life Insurance Company

TOI/Sub-TOI: L07G Group Life - Whole/L07G.101 Fixed/Indeterminate Premium - Single Life

Product Name: Group Level Whole Life - Amendment

Project Name/Number: /

Filing Company Information

Bankers Fidelity Life Insurance CoCode: 61239 State of Domicile: Georgia Company Group Code: 587 Company Type: Life & Health

4370 Peachtree Rd NE Group Name: 61239 State ID Number:

Atlanta, GA 30319 FEIN Number: 58-0658963

(404) 266-5600 ext. [Phone]

Filing Fees

Fee Required? No Retaliatory? No

Fee Explanation:

State: District of Columbia Filing Company: Bankers Fidelity Life Insurance Company

TOI/Sub-TOI: L07G Group Life - Whole/L07G.101 Fixed/Indeterminate Premium - Single Life

Product Name: Group Level Whole Life - Amendment

Project Name/Number: /

Form Schedule

Lead F	Lead Form Number: B 21803 A1							
Item	Schedule Item	Form	Form	Form	Form	Action Specific	Readability	
No.	Status	Name	Number	Туре	Action	Data	Score	Attachments
1		Amendment	B 21803 A1	CERA	Initial			B 21803 CRT A1.pdf
2		Amendment	B 21803 A2	CERA	Initial		51.700	B 21803 CRT A2.pdf

Form Type Legend:

ADV	Advertising	AEF	Application/Enrollment Form
CER	Certificate	CERA	Certificate Amendment, Insert Page, Endorsement or Rider
DDP	Data/Declaration Pages	FND	Funding Agreement (Annuity, Individual and Group)
MTX	Matrix	NAP	Network Access Plan
NOC	Notice of Coverage	ОТН	Other
OUT	Outline of Coverage	PJK	Policy Jacket
POL	Policy/Contract/Fraternal Certificate	POLA	Policy/Contract/Fraternal Certificate: Amendment, Insert Page, Endorsement or Rider
PRC	Provider Contract/Provider Addendum/Provider Leading Agreement	PRD	Provider Directory

BANKERS FIDELITY LIFE INSURANCE COMPANY®

4370 Peachtree Road, N.E., Atlanta, Georgia 30319 [(404) 266-5600]

AMENDMENT

This Amendment is attached to and made a part of the Certificate as of the Effective Date for the Certificate shown on the Certificate's Specifications Page. It is issued in consideration of the answers contained in the application. Except as stated elsewhere in this Amendment, all of the definitions, provisions, conditions, limitations and exceptions of the Certificate to which it is attached apply to this Amendment.

The definition of Insured on Page 4 of the Certificate is hereby replaced with the following:

INSURED – the person: 1) whose enrollment application has been approved by Us; 2) who is named as the Insured on Page 3A of this Certificate; and 3) whose coverage is still in force.

The **CONDITIONS OF COVERAGE** provision on Page 10A of the Certificate is hereby replaced in its entirety by the following:

WHEN COVERAGE STARTS – The Insured under this Certificate is covered at 12:00 a.m. Standard Time on the first day of the month coincident with or following the date the Eligible Employee becomes an Insured under a Certificate issued by Us.

WHEN COVERAGE ENDS (TERMINATION) – Coverage will end automatically at 11:59 p.m. Standard Time on the 1) last day of the month in which the Certificateholder is no longer an Eligible Employee as defined; 2) date the Insured dies; 3) end of the Grace Period when premiums remain unpaid, 4) Maturity Date; 5) date the Certificate is surrendered for its Cash Value; 6) date the Indebtedness exceeds the Cash Value, or 7) date the Group Policy terminates.

WHEN THE CERTIFICATEHOLDER CAN DISCONTINUE COVERAGE – The Certificateholder may discontinue coverage in accordance with the personnel practices of the Group Policyholder's Human Resource department and as permitted under the terms of the Group Policyholder's Health and Welfare Plan.

WHEN EVIDENCE OF INSURABILITY IS REQUIRED – Once the Initial Enrollment Period or Open Enrollment Period is over, an application or other evidence of insurability as determined by and acceptable to Us is required if the Certificateholder: 1) voluntarily canceled coverage on the life of the Insured and is reapplying; or 2) is applying for the coverage at any time after the Initial Enrollment Period or Open Enrollment Period.

VOLUNTARY TERMINATION OF INSURANCE – If the Certificateholder or the Insured terminates their coverage and wishes to re-enroll at a later date, We may require the Certificateholder or the Insured to wait a minimum of one year before that person may re-enroll. The Certificateholder or Insured may only reenroll during the next Open Enrollment Period after the one year has expired. This one year time period will begin on the date coverage was first terminated. Voluntary termination will include termination of coverage due to non-payment of premium. Re-enrollment can only be pursued during an Open Enrollment Period.

The **OTHER INSURANCE WITH US** provision on Page 11 of the Certificate is hereby replaced in its entirety by the following:

You may be insured with Us under more than one (1) Whole Life Insurance Certificate issued by Us under the Group Policy. However, the aggregate benefits payable under all such Certificates may not exceed underwriting limits at the time We issued Your last Certificate. If, through error, You are issued more than one (1) such Certificate which would result in aggregate benefits in excess of Our underwriting limits, then those benefits will be reduced to comply with Our underwriting limits and We will refund any premium You have paid for coverage which is not effective.

This Amendment will terminate when the Certificate to which this Amendment is attached terminates, for any reason.

In witness of the above, **BANKERS FIDELITY LIFE INSURANCE COMPANY** has caused this Amendment to be signed by its President.

President

BANKERS FIDELITY LIFE INSURANCE COMPANY®

4370 Peachtree Road, N.E., Atlanta, Georgia 30319 [(404) 266-5600]

AMENDMENT

This Amendment is attached to and made a part of the Certificate as of the Effective Date for the Certificate shown on the Certificate's Specifications Page. It is issued in consideration of the answers contained in the application. Except as stated elsewhere in this Amendment, all of the definitions, provisions, conditions, limitations and exceptions of the Certificate to which it is attached apply to this Amendment.

The **CONDITIONS OF COVERAGE** provision on Page 10A of the Certificate is hereby changed to include the following:

EXCEPTION – We will postpone the Effective Date of an Eligible Dependent, other than a newborn child's, coverage if, on that date, he or she is: 1) confined to a hospital or other health care facility; 2) home confined; or 3) unable to perform two or more activities of daily living. In that case, we will postpone the Effective Date of his or her coverage until the day after the date: (a) of his or her discharge from such facility; (b) his or her home confinement ends; or (c) he or she is no longer requires assistance with two or more activities of daily living. If a Dependent was covered under a prior plan at replacement, this language will not apply to the amount of coverage that was in force with the prior plan.

This Amendment will terminate when the Certificate to which this Amendment is attached terminates, for any reason.

In witness of the above, **BANKERS FIDELITY LIFE INSURANCE COMPANY** has caused this Amendment to be signed by its President.

President

B 21803 A2 (1-20)

State: District of Columbia Filing Company: Bankers Fidelity Life Insurance Company

TOI/Sub-TOI: L07G Group Life - Whole/L07G.101 Fixed/Indeterminate Premium - Single Life

Product Name: Group Level Whole Life - Amendment

Project Name/Number: /

Supporting Document Schedules

Satisfied - Item:	Statement of Variability
Comments:	
Attachment(s):	B 21803 A1 Statement of Variability.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Actuarial Memorandum Addendum
Comments:	
Attachment(s):	B 21803 GMP CRT - GWL Base_Composite - Actuarial Memorandum.pdf B 21803 - Sample Calculations Exhibits_Composite.pdf
Item Status:	
Status Date:	
Cotinfied Items	Described With Constitution of the constitutio
Satisfied - Item:	Readability Certification
Comments:	TBD
Attachment(s):	B 21803 A1 Amendment Flesch Cert.pdf
Item Status:	
Status Date:	

STATEMENT OF VARIABILITY **B 21803 A1 – Amendment**

B 21803 A2 - Amendment

<u>Variable:</u> Phone Number President's signature

<u>Description</u>
may change if the company phone number changes
will change if a new President is appointed

ACTUARIAL MEMORANDUM

BANKERS FIDELITY LIFE INSURANCE COMPANY

Group Whole Life Insurance Policy Policy Form B 21803 GMP Certificate Form B 21803 CRT Composite

Policy Description

This is a nonparticipating whole life policy with a level death benefit to age 121 and pure endowment of the death benefit at age 121. Premium payments are guaranteed not to increase for the duration of the policy, and the premium paying period is for the duration of the policy or certificate. There is no policy fee on this form. Issue ages for this form are from 18 to 70. The form also permits the policyholder, at issue, to select the option to pay up at a given attained age.

Reserves

Reserves are computed according to the Standard Valuation Law using the Commissioners' Reserve Valuation Method. The reserve bases are the 2017 CSO Ultimate ALB Sex Distinct or Unisex 50% Blend Composite tables, at or below the statutory maximum interest rate with continuous functions. The interest rate used for certificates issued 2018 and later is 3.5%. The maximum interest rate will change each calendar year as required by the Standard Valuation Law or subsequently promulgated law or regulation. Reserves are subject to a floor of the greater of the cash value and one-half the cost of insurance for the current policy year.

Reserves are held on a discounted continuous basis. That is, terminal reserves are fully continuous, but mean reserves are calculated using the continuous net premium discounted with interest only. Deferred Net Premiums will be calculated using the discounted continuous net premium.

Deficiency reserves are calculated using the minimum valuation standard for each year of issue. Deficiency reserves are the excess, if any, of alternative minimum reserves as specified in the Standard Valuation Law over the CRVM reserve.

Non-forfeiture Benefits

Cash values are computed according to the Standard Nonforfeiture Law using the 2017 CSO Ultimate ALB Sex Distinct or Unisex 50% Blend Composite tables, at or below the maximum statutory nonforfeiture interest rate with curtate functions. Reduced paid up insurance and extended term insurance are calculated on the same basis as cash values. The interest rate used for certificates issued 2018 and

later is 4.5%. The maximum interest rate will change each calendar year as required by the Standard Nonforfeiture Law or subsequently promulgated law or regulation.

Actuarial Certification

I, Ada Ngoka Pricing Actuary for Bankers Fidelity Life Insurance Company. I am a member in good standing of the American Academy of Actuaries.

Policy form B 21803 GMP and its certificates provide level benefit whole life insurance with level premium payments for life or until a specified attained age. I certify to the best of information and belief that the reserve and non-forfeiture calculations for this policy are in compliance with the applicable laws and regulations of this state. The benefits provided under this form are reasonable in relation to the premium charged.

Ada Ngoka, ASA, MAAA

Pricing Actuary

Bankers Fidelity Life Insurance Company

4370 Peachtree Road NE

Atlanta, GA 30319

404-266-5610

September 2019

ACTUARIAL MEMORANDUM

BANKERS FIDELITY LIFE INSURANCE COMPANY

Group Whole Life Insurance Policy Policy Form B 21803 GMP Certificate Form B 21803 CRT

Actuarial Basis of Calculations

Symbols are expressed using commutation functions and are computed using the mortality and interest rate appropriate for the context. For example, M_{χ} in the context of reserves uses an interest rate of 3.5%, while in the context of cash values uses a 4.5% interest rate.

Symbol	Definition	Formula
x	Issue age	
m	Years in benefit period	121 – <i>x</i>
n	Years in premium paying period	121 – <i>x</i>
$_{t}DB_{x}$	Death benefit	1000 for all years
PE_{121}	Pure endowment at age 121	1000 at age 121
PV_x	Present value of benefits, cash values	$rac{M_{\chi}}{D_{\chi}}$
\overline{PV}_{x}	Present value of benefits, reserves	$\frac{M_{x}}{D_{x}}$ $\frac{\overline{M}_{x}}{D_{x}}$
λ_{x+1}	Equivalent level amount, reserves	$\frac{9,000}{9} = 1,000$
λ_x	Equivalent level amount, cash values	$\frac{10,000}{10} = 1,000$
EA_x	SNFL Expense Allowance	$0.01 + 1.25 * \min\left(0.04, \frac{M_x}{D_x}\right)$
NFF _x	Non-forfeiture factor	$\frac{(M_x + D_x E A_x)}{N_x}$
$_{t}CV_{x}$	Cash value	$\max\left(0, \frac{M_{x+t} - NFF_x N_{x+t}}{D_{x+t}}\right)$
$_{t}RPU_{x}$	Reduced paid-up insurance	$\frac{{}_{t}CV_{x}}{A_{x+t:\overline{m-t} }}$
$_{t+b}CVrpu_{x}$	Cash value while on RPU	$\left({_{t}RPU_{x}*\frac{{M_{x + t + b}}}{{{D_{x + t}}}}} \right)$, $x + t + b$ is attained age
$_{t}ETI_{x}^{Years}$	Extended term period in years	$\underset{r}{\operatorname{argmax}} \left\{ \frac{M_{x+t} - M_{x+t+r}}{D_{x+t}} \le {}_{t}CV_{x} \right\}$
$_{t}ETI_{x}^{Days}$	Additional extended term period in days rounded up, where $r = {}_{t}ETI_{x}^{Years}$	$\left 365 \frac{{}_{t}CV_{x} - (M_{x+t} - M_{x+t+r})/D_{x+t}}{C_{x+t+r}/D_{x+t}} \right $
t+bCVeti x	Cash value while on ETI	$\left(\frac{M_{x+t+b}-M_{x+t+c}}{D_{x+t+b}}\right)$, $x+t+b$ is attained age,

x + t + c is age at ETI Termination date

Sample Calculations

Exhibit A Sex Distinct Composite

Reserves are CRVM using 2017 CSO Sex Distinct Composite ultimate mortality with discounted continuous functions. These calculations assume male issue age 35, premiums payable to age 120. The interest rate is 3.5%. Starting I_x is 1,000,000.

Symbol	Value
₁₉ P ₃₅₊₁	$\frac{\overline{M}_{36}}{\overline{N}_{36} - \overline{N}_{55}} = \frac{231,475.65}{21,317,302.01 - 8,108,610.78}$
	= 0.01752
$oldsymbol{eta_{35}^{FPT}}$	$\frac{\overline{M}_{36}}{M} = \frac{231,475.65}{M}$
	$\frac{\frac{36}{\overline{N}_{36}} = \frac{3}{21,317,302.01}$
	= 0.01086
$oldsymbol{eta_{35}^{CRVM}}$	eta_{35}^{FPT} , since $eta_{35}^{FPT} \leq {}_{19}P_{36}$
$lpha_{35}$	\overline{c}_x , since $\beta_{35}^{FPT} \leq {}_{19}P_{36}$, which is 0.00139
$\overline{a}_{\overline{1 }}$	0.9829948

$$\frac{1^{V_{35}}}{D_{36}} = \frac{0.00139 * 1,000,000 - 1,386.02}{964,821.26}$$

$$= 0$$

$$\frac{2^{V_{35}}}{D_{37}} = \frac{\overline{M}_{37} - \beta_{35}^{CRVM} \overline{N}_{37}}{D_{37}} = \frac{230,015.1 - 0.01086 * 20,369,613.78}{930,758.87}$$

$$= 0.009487$$

$$\frac{\overline{M}_{38} - \beta_{35}^{CRVM} \overline{N}_{38}}{D_{38}} = \frac{228,468.61 - 0.01086 * 19,455,451.29}{897,764.14}$$

$$= 0.019170$$

$$\frac{3^{M_{35}}}{2} = \frac{2^{V_{35} + \beta_{35}^{CRVM} \overline{\alpha}_{1|}} + {}_{3}V_{35}}{2} = \frac{0.009487 + 0.01086 * 0.9829948 + 0.019170}{2}$$

Exhibit B Sex Distinct Composite

Non-forfeiture values are also based on 2017 CSO Sex Distinct Composite ultimate mortality using curtate functions. These calculations assume male issue age 35, premiums payable to age 120. The interest rate is 4.5%. Starting I_x is 1,000,000.

$$\begin{array}{c|c} \text{Symbol} & \text{Value} \\ \hline \textbf{\textit{EA}}_{35} & 0.01 + 1.25 * \min\left(0.04, \frac{M_{35}}{N_{35}}\right) \\ & = 0.01 + 1.25 * \min\left(0.04, \frac{158,712.36}{19,536,568.49}\right) \\ \hline \textbf{\textit{NFF}}_{35} & \frac{(M_x + D_x EA_x)}{N_x} = \frac{158,712.36 + 1,000,000 * 0.02015}{19,536,568.49} \\ \hline \textbf{\textit{oCV}}_{35} & \max\left(0, \frac{M_{35} - NFF_{35}N_{35}}{D_{35}}\right) \\ & = \max\left(0, \frac{158,712.36 - 0.00916 * 19,536,568.49}{1,000,000}\right) \\ & = \max\left(0, -0.02024\right) \\ & = 0 \\ \hline \textbf{\textit{3CV}}_{35} & \max\left(0, \frac{M_{38} - NFF_{35}N_{38}}{D_{38}}\right) \\ & = \max\left(0, \frac{154,478.27 - 0.00916 * 16,667,949.44}{872,236.86}\right) \\ & = \max\left(0, 0.002149\right) \\ & = 0.002149 \\ \hline \end{array}$$

$$\frac{_{6}CV_{35}}{D_{41}} = \frac{\max\left(0, \frac{M_{41} - NFF_{35}N_{44}}{D_{41}}\right)}{\max\left(0, \frac{149,750.37 - 0.00916 * 14,166,870.49}{759,806.99}\right)} = \max\left(0, \frac{149,750.37 - 0.00916 * 14,166,870.49}{759,806.99}\right)}{= \max\left(0, 0.026382\right)} = \frac{\max\left(0, 0.026382\right)}{A_{35}} = \frac{0.002149}{0.177106}$$

$$= 0.012136$$

$$_{6}RPU_{35} = \frac{_{6}CV_{35}}{A_{41}} = \frac{_{0.026382}}{_{0.133859}}$$

$$= _{6+2}CVrpu_{35} = 0.33859$$

$$= _{6+2}CVrpu_{35} = 0.33859$$

$$= _{6+2}CVrpu_{35} = 0.33859$$

$$= _{6+2}CVrpu_{35} = 0.001751$$

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$$= _{6+2}CVrpu_{35} = 0.00258$$

$$= _{6+2}CV$$

$$\frac{6+2CVeti_{35}, \ 13 \ \text{year ETI}}{\text{surrendered at b} = 2} \left[\frac{\left(M_{41+2} - M_{41+13} \right) / }{D_{41+2}} \right] = \left[\frac{146,440.74 - 129,904.69}{692,539.47} \right] = 0.02388$$

Exhibit C 50% Blend Unisex Composite

Non-forfeiture values are based on 2017 CSO 50% blend Composite ultimate mortality using curtate functions. These calculations assume person issue age 35, premiums payable to age 120. The interest rate is 4.5%. Starting I_x is 1,000,000.

$$\begin{array}{c|c} \hline \text{Symbol} & \text{Value} \\ \hline & \textbf{\textit{EA}}_{35} & 0.01 + 1.25 * \min \left(0.04, \frac{M_{38}}{N_{35}}\right) \\ & = 0.01 + 1.25 * \min \left(0.04, \frac{149,287.73}{19,755,429.41}\right) \\ & = 0.01945 \\ \hline & \textbf{\textit{NFF}}_{35} & \frac{(M_x + D_x E A_x)}{N_x} = \frac{149,287.73 + 1,000,000 * 0.01945}{19,755,429.41} \\ & = 0.00854 \\ \hline & \textbf{\textit{oCV}}_{35} & \max \left(0, \frac{M_{35} - NFF_{35}N_{35}}{D_{35}}\right) \\ & = \max \left(0, \frac{149,287.73 - 0.00854 * 19,755,429.41}{1,000,000}\right) \\ & = \max \left(0, -0.019446\right) \\ & = 0 \\ \hline & \textbf{\textit{acc}} \left(0, \frac{M_{38} - NFF_{35}N_{38}}{D_{38}}\right) \\ & = \max \left(0, \frac{145,992.92 - 0.00854 * 16,885,900.55}{873,136.97}\right) \\ & = \max \left(0, 0.002025\right) \\ & = 0.002025 \\ \hline & \textbf{\textit{acc}} \left(0, \frac{M_{41} - NFF_{35}N_{41}}{D_{41}}\right) \\ & = \max \left(0, \frac{142,293.53 - 0.00854 * 14,381,260.21}{761,582.25}\right) \\ & = \max \left(0, 0.025554\right) \\ & = 0.025554 \\ \hline & 3RPU_{35} & \frac{3CV_{35}}{A_{38}} = \frac{0.002025}{0.167205} \\ & = 0.012112 \\ \hline & 6RPU_{35} & \frac{6CV_{35}}{A_{41}} = \frac{0.025554}{0.186839} \\ & = 0.136769 \\ \hline \end{array}$$

Cash value after 2 years on RPU
$$\left(\frac{cRPU_{35} * \frac{M_{33+4+4}}{D_{35+6}}}{cD_{35+6}} \right) = 0.136769 * \frac{139,744.14}{761,582.25} = 0.0251$$

$$\frac{M_{38} - M_{38+1}}{D_{38}} = 0.001378$$

$$\frac{M_{38} - M_{38+2}}{D_{38}} = 0.002795$$

$$\frac{CV_{35}}{3CV_{35}} = 0.002025$$

$$\Rightarrow \operatorname{argmax} \left\{ \frac{M_{38} - M_{38+7}}{D_{38}} \le {}_{3}CV_{35} \right\} = 1$$

$$\frac{3ETI_{35}^{Days}}{C_{38+1}/D_{38}} = \left[365 \frac{0.002025 - 0.001378}{1237.53/873,136.97} \right]$$

$$= 167$$

$$\frac{M_{41} - M_{41+15}}{D_{41}} = 0.024944$$

$$\frac{M_{41} - M_{41+15}}{D_{41}} = 0.026878$$

$$\frac{cVV_{35}}{C_{41+15}/D_{41}} = 0.026878$$

$$\frac{cVV_{35}}{D_{38}} = 0.025554$$

$$\Rightarrow \operatorname{argmax} \left\{ \frac{M_{38} - M_{38+7}}{D_{38}} \le {}_{6}CV_{35} \right\} = 15$$

$$\frac{6ETI_{35}^{Days}}{C_{41+15}/D_{41}} = \left[365 \frac{0.025554 - 0.024944}{1,473.36/761,582.25} \right]$$

$$= 116$$

$$\frac{6+2CVeti_{35}}{D_{41+2}}, 15 \text{ year}$$

$$\frac{\left(\frac{M_{41+2} - M_{41}}{D_{41+2}} \right)}{D_{41+2}} = \left[\frac{139,744.14 - 1}{694,909.20} \right] = 0.02367$$

Exhibit E 50% Blend Unisex Composite

Reserves are CRVM using 3.5% interest rate and the 2017 CSO 50% blend Composite ultimate mortality with discounted continuous functions.

Sample calculations assume person issue age 35, premiums payable to age 120. The interest rate is 3.5%. Starting I_x is 1,000,000.

Symbol	Value
₁₉ P ₃₅₊₁	\overline{M}_{36} 221,225.79
	$\frac{\overline{N}_{36} - \overline{N}_{55}}{\overline{N}_{36} - \overline{N}_{55}} = \frac{21,624,238.02 - 8,359,665.96}{21,624,238.02 - 8,359,665.96}$
$oldsymbol{eta_{35}^{FPT}}$	\overline{M}_{36} 221,225.79
	$\frac{\overline{M}_{36}}{\overline{N}_{36}} = \frac{221,225.79}{21,624,238.02}$
	= 0.01023
$oldsymbol{eta_{35}^{CRVM}}$	eta_{35}^{FPT} , since $eta_{35}^{FPT} \leq {}_{19}P_{36}$
$lpha_{35}$	\overline{c}_x , since $eta_{35}^{FPT} \leq {}_{19}P_{36}$, which is 0.00107
$\overline{a}_{\overline{1}}$	0.9829948
₁ V ₃₅	$\alpha_{35}D_{35} - \overline{C}_{35} = 0.00107 * 1,000,000 - 1,071.46$
	$\frac{\alpha_{35}D_{35} - \overline{C}_{35}}{D_{36}} = \frac{0.00107 * 1,000,000 - 1,071.46}{965,130.43}$
	=0
$_{2}V_{35}$	$\overline{M}_{37} - \beta_{35}^{CRVM} \overline{N}_{37} = 220,081.33 - 0.01023 * 20,676,085.75$
	$D_{37} = {931,374.18}$
	= 0.009192
$_{3}V_{35}$	$\overline{M}_{38} - \beta_{35}^{CRVM} \overline{N}_{38} = 218,878.83 - 0.01023 * 19,761,150.52$
	$\frac{D_{38}}{D_{38}} = \frac{898,690.60}{898,690.60}$
	= 0.018597
₃ M ₃₅	$_{2}V_{35} + \beta_{35}^{CRVM}\overline{a}_{1 } + _{3}V_{35} 0.009192 + 0.01023 * 0.9829948 + 0.018597$
	2
	= 0.018923

BANKERS FIDELITY LIFE INSURANCE COMPANY

Atlanta, Georgia

FLESCH SCORE CERTIFICATION

B 21803 A1 – Amendment

Words: 556 Sentences: 18 Syllables: 815 Score: 51,4

B 21803 A2 – Amendment

Words: 254 Sentences: 8 Syllables: 369 Score: 51.7

I hereby certify that the Flesch reading ease score of the above forms is as shown.

Jill M. Jones, FLMI, AIRC, FLHC, ACS, AIAA, ARA Assistant Vice President, Regulatory Compliance